

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALLYN D. BELL,
ROBERT D. PETERS,
TORI T. SMITH,

Defendants.

) INDICTMENT
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JUDGE ADAMS

CASE NO.

1:19 CR 70
Title 18, United States Code,
Sections 371, 472 and 2

COUNT 1

(Conspiracy to Pass or Utter Counterfeit Obligations or Securities, 18 U.S.C. § 472, in violation
of 18 U.S.C. § 371)

The Grand Jury charges:

1. From in or around April 6, 2017 and continuing through in or around April 29, 2018, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants ALLYN D. BELL, ROBERT D. PETERS, and TORI T. SMITH, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other to commit one or more offenses against the United States of America, to wit: pass to employees at various commercial establishments, falsely made, forged, and counterfeited obligations of the United States, that is, Federal Reserve Notes in denominations listed below, bearing the serial numbers listed below, which they then knew to be falsely made, forged, and counterfeited, in violation of Title 18, United States Code, Section 472, all in violation of Title 18 United States Code, Section 371.

Objects of the Conspiracy

2. The object of the conspiracy was to enrich Defendants by purchasing items from various commercial establishments using falsely made, forged, and counterfeited obligations of the United States, in violation of Title 18 United States Code, Section 472.

Manner and Means of the Conspiracy

3. To attain the object of the conspiracy, Defendants employed the following manner and means:

a. It was part of the conspiracy that Defendants travelled together to cities in Ohio, Pennsylvania, and Michigan to purchase retail items at various retail stores using falsely made, forged, and counterfeited Federal Reserve (“counterfeit notes”) Notes.

b. It was further part of the conspiracy that Defendants used counterfeit notes to purchase high-value items that were small in size, including but not limited to iPads, electric toothbrushes, electric razors, teeth-whitening kits, and watches.

c. It was further part of the conspiracy that Defendants passed counterfeit notes in the denomination of \$100.

d. It was further part of the conspiracy that the items that they purchased with counterfeit notes from one retail store location were returned for cash at another retail store location, all for the purpose of obtaining non-counterfeit notes.

e. It was further part of the conspiracy that at times, Defendants entered the same retail store together to pass counterfeit notes, and at times, only one Defendant entered a retail store to pass counterfeit notes.

Overt Acts

4. In furtherance of the conspiracy and to achieve its objective, one or more of the members of the conspiracy committed the following overt acts, among others, in the Northern District of Ohio and elsewhere, on or about the following dates:

a. On or about April 6, 2017, BELL and PETERS, with the intent to defraud, did pass to an employee at Target, located at 200 Butler Commons, Butler, PA 16001, falsely made, forged, and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denomination of \$100, which they then knew to be falsely made, forged, and counterfeited.

b. On or about April 6, 2017, BELL, with the intent to defraud, did pass to an employee at Dick's Sporting Goods, located at 400 Greenwood Plaza, Butler Commons, Butler, PA 16001, falsely made, forged, and counterfeited obligations of the United States, that is, four Federal Reserve Notes in the denomination of \$100, Series of 2001, Serial No. CH16028386A; Series of 2003A, Serial No. FD08877078A; Series of 2006, Serial Nos. HB39998703I and HE28080533C, which he then knew to be falsely made, forged, and counterfeited.

c. On or about April 7, 2017, BELL, PETERS, and SMITH, with the intent to defraud, did pass to employees at Best Buy, located at 200 Mall Circle Dr., Monroeville, PA 15146, falsely made, forged, and counterfeited obligations of the United States, that is, twelve Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial No. AC34987011A (2 Notes); Series of 2001, Serial No. CF88591400A (2 Notes) and CH16028386A; Series of 2006, Serial Nos. HB12728801Q (3 Notes), HB39998703I,

HE28080533C, and HL24441032E; and Series of 2006A, Serial No. KD86672986A, which they then knew to be falsely made, forged, and counterfeited.

d. On or about April 8, 2017, BELL returned for cash the item that he purchased from Dick's Sporting Goods on April 6, 2017, to Dick's Sporting Goods, located at 7850 Mentor Ave, Mentor, OH 44060.

e. On or about April 27, 2017, PETERS, with the intent to defraud, did pass to an employee at Sheetz, located at US Route 22 & Route 981, New Alexandria, PA 15670, a falsely made, forged, and counterfeited obligation of the United States, that is, one Federal Reserve Note in the denomination of \$100, Series of 1999, Serial No. BJ10210860A, which he then knew to be falsely made, forged, and counterfeited.

f. On or about April 27, 2017, BELL, PETERS, and SMITH, with the intent to defraud, did pass to an employee at Walmart, located at 300 Resort Plaza Dr., Blairsville, PA 15717, falsely made, forged, and counterfeited obligations of the United States, that is, seven Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos. AB70216705V and AL05209461D; Series of 2001, Serial No. CK00218412A; Series of 2003A, Serial No. FD08877078A; Series of 2006, Serial No. HB96674060E; and Series of 2006A, Serial No. KB70902471B (2 Notes), which they then knew to be falsely made, forged, and counterfeited.

g. On or about April 27, 2017, PETERS, with the intent to defraud, did pass to an employee at Walmart, located at 300 Wal-Mart Dr., Ebensburg, PA 15931, falsely made, forged, and counterfeited obligations of the United States, that is, four Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial No. AL05209461D; Series of 2003A, Serial No. FF81515339C and FK13426813B; and Serial of 2006A,

Serial No. KB70902471B, which he then knew to be falsely made, forged, and counterfeited.

h. On or about April 27, 2017, BELL, with the intent to defraud, did pass to an employee at GameStop, located at 2740 Old Route 22N, Altoona, PA 16601, falsely made, forged, and counterfeited obligations of the United States, that is, three Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos. AB70216705V and AL05209461D; and Series of 2001, Serial No. CK00218412A, which he then knew to be falsely made, forged, and counterfeited.

i. On or about April 27, 2017, SMITH, with the intent to defraud, did pass to an employee at T.J. Maxx, located at 2700 Old Route 220, Altoona, PA 16601, a falsely made, forged, and counterfeited obligation of the United States, that is, one Federal Reserve Note in the denomination of \$100, Series of 2003A, Serial No. FD08877078A, which he then knew to be falsely made, forged, and counterfeited.

j. On or about April 27, 2017, BELL, PETERS and SMITH, with the intent to defraud, did pass to an employee at Target, located at 153 Sierra Dr., Sierra N. Plaza, Altoona, PA 16601, falsely made, forged, and counterfeited obligations of the United States, that is, four Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos. AB70216705V and AL05209461D; Series of 1999, Serial No. BJ10210860A; and Series of 2001, Serial No. CH16028386A, which they then knew to be falsely made, forged, and counterfeited.

k. On or about April 27, 2017, PETERS, with the intent to defraud, did pass to an employee at Kohl's, located at 275A Colonnade Blvd., State College, PA 16603, falsely made, forged, and counterfeited obligations of the United States, that is, seven

Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial No. AB70216705V, Series of 2001, Serial No. CK00218412A (2 Notes); Series of 2003A, Serial Nos. FB58599384B (2 Notes) and FK13426813B; and Series of 2006, Serial No. HB96674060E, which he then knew to be falsely made, forged, and counterfeited. Specifically, PETERS used the counterfeit notes to purchase two Citizen watches in two separate transactions.

l. On or about April 28, 2017, the sales receipt for the April 27, 2017 purchase that PETERS made at Kohl's, located in State College, PA, was used to complete a cash return at the Kohl's located at 8100 Macedonia Commons Blvd., Macedonia, OH, 44056 in the amount of approximately \$409.96. The return was for one of the Citizen watches that PETERS purchased.

m. On or about April 28, 2017, the sales receipt for the April 27, 2017 purchase that PETERS made at T.J. Maxx, located in Novi, MI, was used to complete a cash return at the TJ Maxx located at 330 Howe, Avenue, Cuyahoga Falls, OH.

n. On or about July 13, 2017, BELL and SMITH, with the intent to defraud, did pass to an employee at Target, located at 550 Grandview Crossing, Gibsonia, PA 15044, falsely made, forged, and counterfeited obligations of the United States, that is, Federal Reserve Notes in the denomination of \$100, which they then knew to be falsely made, forged, and counterfeited.

o. On or about July 13, 2017, BELL, with the intent to defraud, did pass to an employee at Dick's Sporting Goods, located at 830 Providence Blvd., Pittsburgh, PA, falsely made, forged, and counterfeited obligations of the United States, that is, five Federal Reserve Notes in the denomination of \$100, Series of 2006, Serial No.

HB34456084I; Series of 1996, Serial Nos. HB40401622P, HL04666326F and AB42978159A; and Series of 1999, Serial No. BB98406232A, which he then knew to be falsely made, forged, and counterfeited.

p. On or about July 13, 2017, BELL and SMITH, with the intent to defraud, did pass to an employee at Old Navy, located at 8900 Covenant Ave., Grandview Crossing, Pittsburgh, PA 15237, falsely made, forged, and counterfeited obligations of the United States, that is, two Federal Reserve Notes in the denomination of \$100, Series of 2001, Serial No. CB11581312F; and Series of 1996, Serial No. HB40401622P, which they then knew to be falsely made, forged, and counterfeited.

q. On or about July 13, 2017, BELL, with the intent to defraud, did pass to an employee at Target, located at 4801 McKnight Rd., Pittsburgh, PA 15237, falsely made, forged, and counterfeited obligations of the United States, that is, five Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos. AB42978159A, HB40401622P and HL04666326F; and Series of 1999 Serial No. BB98406232A; and Series of 2006, Serial Nos. HB34456084I; which they then knew to be falsely made, forged, and counterfeited.

r. On or about July 13, 2017, SMITH, with the intent to defraud, did pass to an employee at HomeGoods, located at 2715 Market St., Fairlawn, OH 44333, falsely made, forged, and counterfeited obligations of the United States, that is, two Federal Reserve Notes in the denomination of \$100, which he then knew to be falsely made, forged, and counterfeited.

s. On or about July 14, 2017, the sales receipt for the July 13, 2017 purchase that SMITH made at HomeGoods, located in Fairlawn, Ohio, was used to complete a cash return at the same HomeGoods location in the amount of approximately \$64.03.

t. On or about July 14, 2017, the sales receipt for the July 13, 2017 purchase that BELL made at Dick's Sporting Goods, located in Pittsburgh, PA, was used to complete a cash return at the same Dick's Sporting Goods location in the amount of approximately \$460.08.

u. On or about July 25, 2017, SMITH, with the intent to defraud, did pass to an employee at Target, located at 153 Sierra Dr., Altoona, PA 16601, falsely made, forged, and counterfeited obligations of the United States, that is, four Federal Reserve Notes in the denomination of \$100, Series of 2001, Serial No. CB11581312F; Series of 2006, Serial No. HB34456084I; and Series of 1996, Serial No. HB40401622P (2 Notes), which he then knew to be falsely made, forged, and counterfeited. Specifically, PETERS used the counterfeit notes to purchase an Apple watch in the amount of approximately \$349.79.

v. On or about July 26, 2017, SMITH used the sales receipt for the July 25, 2017 purchase that BELL made at Target, located in Altoona, PA, to complete a cash return at the Target located at 449 Howe Ave, Cuyahoga Falls, OH 44221, in the amount of approximately \$349.79. SMITH returned the Apple watch that PETERS purchased.

w. On or about August 30, 2017, BELL and SMITH, with the intent to defraud, did pass to an employee at Walmart, located at 1 Hilltop Plaza, Kittanning, PA 16201, falsely made, forged, and counterfeited obligations of the United States, that is, eight Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos.

AB34684217W, AB82855295R, and AB84257314C (2 Notes); Series of 1999, Serial No. BI69785422A (2 Notes); and Series of 2006A, Serial No. KB73219531N (2 Notes), which they then knew to be falsely made, forged, and counterfeited.

x. On or about August 30, 2017, SMITH, with the intent to defraud, did pass to an employee at Walmart, located at 3100 Oakland Ave., Indiana, PA 15701, falsely made, forged, and counterfeited obligations of the United States, that is, three Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial Nos. AB34684217W and AB82855295R; and Series of 1999, Serial No. BI69785422A, which he then knew to be falsely made, forged, and counterfeited.

y. On or about August 30, 2017, SMITH, with the intent to defraud, did pass to an employee at Dick's Sporting Goods, located at Hempfield Point, Rural Route 17, Greensburg, PA 15601, falsely made, forged, and counterfeited obligations of the United States, that is, two Federal Reserve Notes in the denomination of \$100, Series of 1996, Serial No. AB84257314C; and Series of 2006, Serial No. HK10145785B, which he then knew to be falsely made, forged, and counterfeited. SMITH purchased products in the approximate amount of \$211.98.

z. On or about September 1, 2017, the sales receipt for the August 30, 2017 purchase that SMITH made at Dick's Sporting Goods, located in Greensburg, PA was used to complete a cash return at the Dick's Sporting Goods located at 5500 Buckeystown Pike, Suite 900, Frederick, MD 21703, in the approximate amount of \$211.98.

aa. On or about September 14, 2017, BELL, with the intent to defraud, did pass to an employee at Walmart, located at 20 Industrial Drive, Dubois, PA 15801,

falsely made, forged, and counterfeited obligations of the United States, that is, three Federal Reserve Notes in the denomination of \$100, Series of 2001, Serial No. CK50852628A; and Series of 2006, Serial No. HK67805235B (2 Notes), which he then knew to be falsely made, forged, and counterfeited.

COUNT 2

(Passing or Uttering Counterfeit Obligations or Securities,
in violation of 18 U.S.C. § 472 and 2)

The Grand Jury further charges:

On or about July 13, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant TORI T. SMITH, with the intent to defraud, did pass to an employee at HomeGoods, located at 2715 Market St., Fairlawn, OH 44333, falsely made, forged, and counterfeited obligations of the United States, that is, two Federal Reserve Notes in the denomination of \$100, which he then knew to be falsely made, forged, and counterfeited, in violation of Title 18, United States Code, Sections 472 and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.